



Handwritten signatures and initials

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 87 06

UNITED STATES OF AMERICA,

Plaintiff,

v.

Beatriz LOPEZ-Martinez

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about August 7, 2008, within the Southern District of California, defendant Beatriz LOPEZ-Martinez did knowingly and intentionally import approximately 21.92 kilograms (48.224 pounds) of cocaine a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Felix J. Castaneda
Felix J. Castaneda
Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 8th,
DAY OF August 2008.

Peter C. Lewis
PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Beatriz LOPEZ-Martinez

4 STATEMENT OF FACTS

5 This statement of facts is based on the reports, documents, and notes furnished
6 to U. S. Immigration and Customs Enforcement Special Agent Felix J. Castaneda.

7 On August 7, 2008 at approximately 1335 hours, Beatriz LOPEZ-Martinez
8 (LOPEZ) entered the United States at the Calexico, California, West Port of Entry.
9 LOPEZ was the registered owner of a 2002 Ford Focus. LOPEZ was traveling with her
10 two minor children.

11 LOPEZ gave Primary Officer Dorantes a negative oral customs declaration.
12 Officer Dorantes noticed that when LOPEZ presented her entry document her hands
13 were trembling.

14 Officer Jones who was conducting a pre-primary operation advised Officer
15 Dorantes that his Narcotic Detector Dog had alerted to the rear of LOPEZ's car. Officer
16 Dorantes removed LOPEZ from the vehicle and escorted her and the vehicle to
17 secondary for further inspection.

18 A subsequent inspection of the vehicle revealed 16 packages concealed in a
19 non-factory built compartment located above the gas tank. A package was probed
20 extracting a white powder substance which field tested positive for the presence of
21 cocaine. The 16 packages had a combined net weight of approximately 21.92
22 kilograms (48.224 pounds).

23 Special Agent Castaneda advised LOPEZ of her rights per Miranda. LOPEZ
24 stated she understood her rights and was willing to answer questions without the
25 presence of an attorney. LOPEZ stated she was to pick the vehicle up in Mexicali,
26 Mexico, and would be paid \$1,000.00. LOPEZ stated she has done this on four prior
27 occasions. LOPEZ stated she drops off the vehicles on a street in Paramount,
28 California, and gets paid \$1,000.00 on each occasion.

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